

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

In re

RONCO HOLDINGS, INC.,

Debtor.

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CASE NO. 18-10511-TMD

Chapter 11

**DEBTOR'S RESPONSE TO UNOPPOSED MOTION TO (I) ALLOW AND COMPEL
PAYMENT OF POST-PETITION ADMINISTRATIVE RENT AND (II) COMPEL
ASSUMPTION OR REJECTION OF LEASE**

TO THE HONORABLE TONY M. DAVIS,
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Ronco Holdings, Inc. ("RHI"), the Debtor herein, and files this Response to Unopposed Motion to (I) Allow and Compel Payment of Post-Petition Administrative Rent and (II) Compel Assumption or Rejection of Lease (the "Motion"), and in support shows the following.

1. As noted in the Motion, the Debtor does not oppose the allowance of Kaonoulou Ranch, LLLP's (the "Landlord") administrative rent claim or the fixing of a date certain by which the Debtor must assume or reject the Ronco Lease (as defined in the Motion). Counsel for the Landlord and the Debtor have negotiated the terms of an amended order that addresses the issues contained in the Motion. The negotiated order would also fix and allow the Landlord's rejection claim pursuant to 11 U.S.C. § 502(b)(6). It is anticipated that the proposed negotiated order will be filed with the Bankruptcy Court and uploaded by the Landlord for entry. The Order that accompanied the Motion would be replaced with the negotiated amended order. The 21-day negative notice period under which the Motion was filed extends through today, August 3, 2018.

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court defer entry of the order that accompanied the Motion, pending the filing and uploading of an amended order by the Landlord, and grant such further relief as to which the Debtor may show itself to be justly entitled.

Dated: August 3, 2018

Respectfully submitted,

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By: /s/ Kell C. Mercer
Kell C. Mercer
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COUNSEL FOR RONCO HOLDINGS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this August 3, 2018, I served the foregoing pleading via the Court's ECF/ECM system on all parties registered to receive notice thereby.

/s/ Kell C. Mercer
Kell C. Mercer